Section 6 Modification/100 California Street
Marc Gille
to:
Carmen Santos
10/18/2010 10:54 AM
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History: This message has been replied to.

Carmen-
Per your request, please see the attached modification to Section 6.
We look forward to your favorable reply.
Thanks
Marc

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6.0 Cleanup Verification

Attachment D - Based upon testing results and the potential for fracturing granite sheets for the purposes of chip sampling, the final determinations of "clean surfaces" be determined based upon surface wipe sampling of 100 square centimeters of stone sheathing edges using methanol as a wiping solvent. All sample results will be expressed in micrograms/100 square centimeters. The sampling strategy will be based upon a sampling grid that is extended from an EPA Sampling Document for grid sampling of soils in the field. This is a statistically valid sampling protocol (Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup; EPA-560/5-85-026, August, 1985 & Wipe Sampling & EPA PCB Spill Cleanup Policy; April, 1991). It introduces a technically random sampling scheme based upon a random number generator and assignment of the areas to be sampled with unique identifiers. The results of wipe samples taken will be documented to the reporting limits of the method, which means that results will be reported down to ~0.25 ug/cm2. This should give EPA confidence in the actual values of the wipe samples well below the regulatory limits established in the regulation.

Clearance levels will < 10 micrograms / 100 cc - accessible areas (i.e. < 25' from ground)
Clearance levels will be < 15 micrograms / 100 cc - non accessible areas (i.e. >25' from ground)

6.01 Replacement Caulking

The replacement caulking is a silicone based material known as SilPruf. It does not contain PCB's. Silicones are somewhat permeable and may reabsorb some residual PCB's. The amount of PCB's that would be reabsorbed would be dependent upon the amount (ppm) remaining within the substrates and the longevity of the caulking at that substrate. Assuming that the silicone caulking will remain 50+ years in-situ, there will be no change in exposure assessment for the building based upon current criteria.